

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)
)
v.)
)
VLADIMIR SHURLAN,)
Defendant.)

DOCKET NO: 05-10100-01

AFFIDAVIT OF VLADIMIR SHURLAN

I, Vladimir Shurlan, on oath depose and state as follows:

1. The following statements are true and accurate the best of my knowledge and are made solely for the purpose of my motion for the early termination of my supervised probation and for permission to travel out of the United States.

2. I am requesting permission from the Court to travel to Serbia with my elderly Mother, Miroslava V. Shurlan (DOB 9/20/23), who is frail and who is of failing health. My Mother has a variety of health problems, including hypertension, chronic varicose veins, heart disease, urinary problems, chronic sciatica, and vision problems and is fully dependent upon me to take her of her daily living needs.

3. My Mother was born in Yugoslavia and wishes to return to her native country to live out her remaining years. She also wishes to return to Serbia as expeditiously as soon as possible as her sole remaining sister, Lyilyana Miletic (age 73) is also elderly and is in failing health, having breast cancer which is now in a terminal stage. On information and believe, Ms. Miletic is not expected to live long.

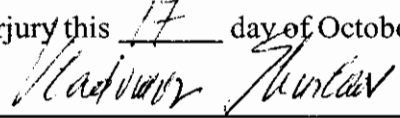
4. I have been my Mother's sole caretaker for approximately 25 years. My Mother does not speak or understand English at all. My Mother cannot travel back to her native country with^{out} the aid, assistance, and presence of the Defendant.

5. My Mother wishes to live out her remaining days in Serbia as well. However, she cannot do so without me.

6. My supervised probation is scheduled to expire on or about October 19, 2007. I have been compliant with all terms and conditions of ~~his~~^{my} probation, and ask this Court for permission to travel to Serbia with my Mother so that she may be with her sister during her last days and so that I may reside with my Mother.

6. My Mother and I would be residing with Mrs. Branka Shurlan, of my deceased Father's family, in Serbia.

Signed under the pains and penalties of perjury this 17 day of October, 2006.



Valdimir Shurlan,